

Remarks

By the foregoing Amendment, claim 1 is amended. No new matter is added by this Amendment. Entry of the Amendment, and favorable consideration thereof, is earnestly requested.

The Examiner has rejected independent claim 1 (and dependent claims 2-19) under 35 U.S.C. 35 U.S.C. §103 as obvious over Perlin, U.S. Patent No. 6,031,525, at the time of the invention in view of the "Scrolling Keyboard for Three Key Input of Alphanumeric Characters" technical bulletin ("IBM reference"). Accordingly, claim 1 has been amended, and this rejection is respectfully traversed.

Novelty

Neither Perlin nor the IBM reference anticipates independent claim 1, as amended, because all of the elements in claim 1 are not shown in either of these references. As noted by the Examiner, Perlin, at the very least, does not disclose selecting alphanumeric characters in a scrolling-way. The IBM reference, of course, relates to the selection of characters via an alphanumeric keyboard.

Obviousness

Neither Perlin nor the IBM reference renders claim 1 obvious in view of the other, as there is no suggestion or motivation for one skilled in the art to combine these references. Perlin relates to selecting characters by moving a stylus along various locations on a surface, while the IBM reference relates to selecting characters by using a simple keyboard. Therefore, because the IBM reference relates to an input device with a completely different structural design than the character selection mechanism of Perlin, a person skilled in the art would not look to the IBM reference reference in order to modify the design of Perlin.

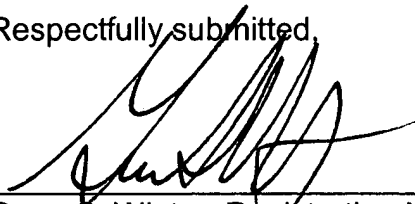
Moreover, the invention of claim 1, as amended, would not be obvious over Perlin in view of the IBM reference because Perlin teaches against using the scrolling method of changing alphanumeric characters disclosed in the IBM reference, as Perlin describes the use of a surface divided into enough zones to account for the entire alphabet, and specifically teaches the user to move a stylus into the “major” zone and the “minor” zone associated with a particular letter to select that letter.

Finally, even if the Perlin and IBM references were combined, one would still not arrive at the invention of Claim 1, as amended, as the combination of these references would still not result in a device that selects each alphanumeric character via a scrolling vertical movement, and then adds that character via horizontal movement. This is the case for two reasons. First, Perlins—which has been cited as disclosing both the vertical and horizontal movement—does not disclose selection of an alphanumeric character via vertical movement, and then subsequent addition of that *already selected* character via horizontal movement because, even in instances where horizontal movement is employed, *both* that horizontal movement and the vertical movement are required to select the character. Second, if one altered Perlin to incorporate the scrolling mechanism of the IBM reference, then Perlin would also have to be altered such that it no longer employs the vertical and horizontal movement disclosed and cited, as the scrolling mechanism described in the IBM reference involves scrolling through a list of characters, which must then be selected by pressing an ENTER key. For each of these reasons, even if a person skilled in the art tried to import the scrolling feature of the IBM reference into Perlin, one would still not arrive at a device having all of the elements of claim 1, as amended.

It is respectfully submitted that claims 1-31, all of the claims remaining in the application, are in order for allowance, and early notice to that effect is respectfully requested.

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Response to Official Action

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Gene S. Winter', written over a horizontal line.

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